

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

WINFRED MUCHIRA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:14-cv-770 (AJT/JFA)
)	
HALAH AL-RAWAF, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

**DEFENDANTS' PARTIAL OPPOSITION TO
PLAINTIFF'S MOTION TO STRIKE OR FOR LEAVE TO FILE**

Defendants hereby oppose the relief sought in Plaintiff's Motion to Strike (Dkt. 135) in the form of striking Defendants' Statement of Undisputed Facts. Defendants do not oppose Plaintiff's alternative relief of being allowed to file a separate document titled Responses to Defendants' Statement of Undisputed Facts along with its collected exhibits.

In support of Defendants' opposition, they state as follows:

1. Defendants' failure to comply with Local Rule 56 was not intentional. In preparing its statement of undisputed facts, counsel for Defendants noticed the "Statement of Undisputed Facts" entry in the ECF system and did not properly apply Local Rule 56.
2. Plaintiff was clearly able to evaluate and respond to the Statement of Undisputed Facts, even improperly filed, as evidenced by their draft response.

In the interest of justice and the resolution of the meritorious issues raised by Defendants' Motion for Summary Judgment, Defendants respectfully ask this Court to deny Plaintiff's

motion to strike Defendants' Statement of Undisputed Facts, but instead grant Plaintiff's request for leave to file her responsive pleading.

Dated: March 12, 2015

/s/ Jay M. McDannell

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CERTIFICATE OF SERVICE

I certify that today, March 12, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically send a notification of such filing (NEF) to the following:

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